

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

C.A. No.:

DECLARATION OF CHRISTOPHER R. LUNDY

Pursuant to 28 U.S.C. § 1746, I, Christopher R. Lundy, hereby declare as follows:

1. I am a resident of the State of Maryland. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the Mayor and City Council of Baltimore as Director of the Baltimore City Mayor's Office of Small & Minority Business & Advocacy ("MOSMBA&D").

3. The Baltimore City Mayor's Office of Small & Minority Business & Advocacy is responsible for operating the U.S. Department of Commerce Baltimore Minority Business Development Agency Advanced Manufacturing Center.

4. As Director of the agency responsible for the operations of the MBDA Advanced Manufacturing Center, I am extremely familiar with their operations. MOSMB&D supports and

oversees the operations of the Center. The Center is staffed by business specialists who work with client businesses to provide needed technical assistance.

5. In my experience as Director of MOSMBA&D, the Baltimore MBDA Advanced Manufacturing Center has greatly benefited our local and regional small businesses. The Center offers targeted assistance to minority manufacturers that aim to employ new technologies and business methodologies to increase the number of “Made in America” products that can be sold domestically and globally.

6. I submit this declaration in connection with Executive Order 14238, “Continuing the Reduction of the Federal Bureaucracy,” which directed seven federal agencies, including the Minority Business Development Agency (MBDA), to eliminate any non-statutory components and functions to the maximum extent consistent with applicable law, and to reduce the performance of any statutory functions and associate personnel to the minimum presence and function required by law.

7. The MBDA is the primary federal agency tasked to assist Minority Business Enterprises (MBEs) in overcoming the history of social and economic disadvantage that has limited their participation in America’s economy.

8. Pursuant to an agreement with the MBDA, MOSMBA&D operates the Baltimore MBDA Advanced Manufacturing Center.

9. The Advanced Manufacturing Center offers targeted technical assistance to minority manufacturers that aim to employ new technologies and business methodologies to increase the number of “Made in America” products that can be sold domestically and globally. This assistance includes, but is not limited to, helping businesses categorize immediate and long-term business needs, goals, and to aid in gaining access to financing, contracts and other sales

opportunities, domestic and global markets, specialized consulting and training, and support through business and industry advocacy.

10. In providing those services, the Advanced Manufacturing Center is funded solely by the MBDA's provision of an annual grant.

11. In my opinion, the MBDA's services outlined above are critical for the development of Minority Businesses Enterprises in Maryland because of the specialized expertise provided by consultants with expertise in manufacturing. The Center currently fills a void of services targeted at small local manufacturers.

12. The MBDA also provides grants through pilot projects and programs such as Entrepreneurship Education for Formerly Incarcerated Persons, Capital Readiness, and Enterprising Women of Color Business Centers.

13. In 2021 MOSMBA&D received a five (5) year MBDA grant to operate the Advanced Manufacturing Center through June 30, 2026, in the amount of two million dollars (\$2,000,000) across the five (5) year period, for four hundred thousand dollars (\$400,000) per year to provide business clients with organization and financial management, business development, strategic planning, procurement, exporting, and technology adoption.

14. MOSMBA&D's budget for this year has relied on this funding, and we made plans and allocated funding, and offset other funding for small business development resources and programming based on the anticipated receipt of the promised funding.

15. MOSMBA&D fully intended to apply to continue to receive the MBDA to operate the Advanced Manufacturing Center beyond June 30, 2026.

16. Any pause in funding would have immediate service impacts and negatively impact the business community.

17. MBDA previously advised that the Center was required to utilize Salesforce. The Advanced Manufacturing Center no longer has access to Salesforce, the client records management system relied upon to document client interactions. Prior to fully losing access to the system the provided licenses to Salesforce were reduced from three (3) to two (2). The Center will be unable to complete the Cumulative Goals Report detailing their vital work absent access to the system. Pursuant to MBDA's guidance the Center has been advised to manually track client interactions but was not provided with any template or guidance beyond that advisement. Furthermore, the Program Analyst assigned to field questions or concerns from the Center is no longer available to provide that assistance.

18. The Advanced Manufacturing Center for the Mid-Atlantic has had exemplary performance throughout our term as operators. Prior to the Executive Order, our performance would not have posed any issue to the continuation of the MBDA grant beyond June 2025.

19. The currently available funds have been disbursed and drawn down.

20. If we do not receive future disbursements/reimbursements, it will prevent the continuation of services to the small business community.

21. The lack of funding will result in the erasure of the support system that the Center has provided to help client businesses to grow and thrive. The Center will be unable to advance these businesses changing the manufacturing landscape by leveraging a network of local, state, regional, and national relationships to open doors for clients and customers to larger and emerging markets.

22. The loss of the Baltimore Advanced Manufacturing Center will make Maryland less competitive in the manufacturing sector. If the MBDA ceased to function in a meaningful way, in my opinion, it will have a nationwide negative impact on domestic manufacturing. The

lack of needed business assistance and resources will result in the closure of manufacturing businesses. Even if only the Baltimore MBDA Advanced Manufacturing Center were to cease operations, the next closest Centers in Kentucky and Connecticut would not be feasible for Baltimore businesses to take advantage of their services.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on April 3, 2025, at Baltimore, Maryland.



CHRISTOPHER R. LUNDY